

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PAVEL SOLOVEV,

Plaintiff,

Case No: 0:23-CV-62179-JB

vs.

TRAVELWORKS, INC. et al.,

Defendants.

NOTICE OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(i)

Pursuant to F.R.C.P. 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, the plaintiff, PAVEL SOLOVEV, by and through his undersigned counsel, hereby give notice that the above-captioned action is voluntarily dismissed against ALL DEFENDANTS.]

MEMORANDUM OF LAW

F.R.C.P. 41(a)(1)(A)(i) allows the dismissal of a Defendant without a Court Order before an opposing party serves either an answer or a motion for summary judgment. Here, the Defendants did not file any answer, nor did they file a motion for summary judgment. As such, the dismissal can be accomplished without Court Order.

Dated: November 29, 2024

WHEREFORE, Plaintiff is entitled to a Default Judgment under the Federal Rules of Civil Procedure.

Respectfully submitted,

By:

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/s/ Andre G. Raikhelson
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Florida Bar Number: 123657

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CERTIFICATE OF SERVICE

I hereby certify that I have served all counsel of record through the federal efilng system
on April 19, 2024.

/s/ Andre G. Raikhelson
Andre G. Raikhelson, Esq